

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEBORAH ALISON THOMAS as Administrator of  
the Estate of PAGET BEAZER Deceased, and  
DEBORAH ALISON THOMAS, Individually,

Docket No.: 7:19-cv-10826

Plaintiff,

- against -

MONSANTO COMPANY,

Defendant.  
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~~PROPOSED~~ **RULE 502(D) ORDER**

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

**IT IS SO ORDERED.**

Date: 3/5, 2020

  
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HONORABLE CATHY SEIBEL  
United States District Judge